

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

OLIVIA Y, et al

PLAINTIFFS

vs.

CIVIL ACTION NO. 3:04cv251-TSL-FKB

PHIL BRYANT, et al

DEFENDANTS

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**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS' AMENDED MOTION FOR RELIEF PURSUANT TO REMEDY PHASE  
OF PLAINTIFFS' RENEWED MOTION FOR CONTEMPT, FOR AN EVIDENTIARY  
HEARING, AND FOR APPOINTMENT OF RECEIVER**

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Defendants respectfully request an extension of time to respond to the *Plaintiffs' Amended Motion for Relief Pursuant to Remedy Phase of Plaintiffs' Renewed Motion for Contempt, for an Evidentiary Hearing, and for Appointment of Receiver* ("Plaintiffs' Amended Motion").

Defendants' response was originally due on July 17, 2019, and the Court extended the time to file the response to August 19, 2019. The Court's July 16, 2019 Order granting the extension also granted Defendants "leave to request additional time if needed." Defendants are now seeking an extension until September 3, 2019.

This extension is sought for good cause. Defendants' lead attorney, Kenya Rachal, is on intermittent leave due to family issues beyond her control, and the leave has extended beyond the periods anticipated when the first motion was filed. Therefore, additional time is needed to prepare a response as the issues discussed in Plaintiffs' Amended Motion are numerous and complex. Plaintiffs' earlier motion (Dkt #739) addressed only one requirement from the Second Modified Settlement Agreement. Plaintiffs' Amended Motion is now much more extensive and

wide-ranging in addressing allegations regarding more than 75 requirements. Defendants have been diligently working on a response to Plaintiffs' Amended Motion, but an extension is necessary to allow Defendants to thoroughly respond. Accordingly, Defendants respectfully request an extension of time until September 3, 2019 to respond to the Plaintiffs' Amended Motion.

Respectfully submitted, this the 12th day of August, 2019.

By: /s/ Kenya Key Rachal

Kenya Key Rachal (MSB #99227)  
James L. Jones (MSB #3214)  
BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ, PC  
One Eastover Center  
100 Vision Drive, Suite 400  
Jackson, Mississippi 39211  
Telephone: (601) 351-2400  
Facsimile: (601) 351-2424

Harold E. Pizzetta, III  
Special Assistant Attorney General  
OFFICE OF THE MISSISSIPPI ATTORNEY GENERAL  
PO Box 220  
Jackson, MS 39205